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December 3, 2013

The Honorable Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: ***United States v. Rudy Kurniawan***
S1 12 Cr. 376 (RMB)

Dear Judge Berman:

The Defense attorneys on the *U.S. v. Kurniawan* litigation request that Your Honor allow us to arrange for the provision of secure high-speed wired Internet access in the courtroom as well as Remote Real Time transcript feed that can be viewed by Court authorized individuals outside of the courthouse. The secure Internet connection will enable the trial team in the courtroom to stay connected to our online case repository and resources in the office during critical moments of the proceedings. This will greatly facilitate the effective representation of all parties involved on this matter. In addition, we will be able to reduce the files and personnel we bring into the courtroom, as well as the traffic to and from the courtroom during proceedings.

The Remote Real Time feed will enable the official court reporter to send a real time transcript feed over a secure connection to court authorized users following the proceedings from locations outside of court such as firm offices or war rooms. Parties will be responsible for all official court reporter fees.

Subject to your approval, we will retain Courtroom Connect to provide these services, a vendor who has a contract with the Southern District of New York to be the exclusive provider of Internet access for attorneys. Courtroom Connect does not require any court resources to provide service and currently maintains a network in the courthouse that is 100% independent of the Court's internal network. Set up, installation and service fees will be paid for by the parties at no cost to the Court.

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The following describes how Courtroom Connect restricts access to the network and ensures compliance with court security and directives:

- The network will be a hard-wired, secure physical network connection utilizing a firewall and other security provisions.
- Onsite support, maintenance, monitoring, off-site user authentication, and many other measures are provided to ensure the highest levels of security and reliability.
- The network is totally separate from the court's internal network; it is therefore physically impossible for information on the court's existing systems to be accessed or compromised.

Courtroom Connect will make all necessary arrangements with the Court's District Executive office and computer networking personnel. Sumit Chatterjee (phone: 650-814-5776) from Courtroom Connect is available to answer any questions about service and can provide any additional information that you would like.

Many trials in federal courts throughout the country have utilized a high speed connection to the Internet in the courtroom and secure Remote Real Time Transcript feeds. Specifically, Courtroom Connect has provided services on a number of trials before the Southern District of New York. Below is a sample list of recent trials in SDNY where Internet access has been utilized.

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|--|------------------------------|-----------|
| 1) <i>United States v Bonventre</i>
2013 | Honorable Laura Taylor Swain | Oct |
| 2) <i>United States v Mazer</i>
2013 | Honorable George Daniels | Oct |
| 3) <i>United States v Ghavami</i>
2013 | Honorable Kimba Wood | July |
| 4) <i>United States v Newman</i>
2012 | Honorable Richard Sullivan | Nov |
| 5) <i>United States v Carollo</i> | Honorable Harold Baer | May 2012 |
| 6) <i>United States v Gupta</i> | Honorable Jed Rakoff | June 2012 |
| 7) <i>United States v Rajaratnam</i>
Mar 2011 | Honorable Richard Holwell | |

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8) <i>United States v Daugerdas</i> Feb 2011	Honorable William Pauley	
9) <i>Terra Firma v CitiGroup</i> 2010	Honorable Jed Rakoff	Oct
10) <i>Tyco International v Walsh</i> Oct 2010	Honorable Denise Cote	
11) <i>United States v Cuti</i> Apr 2010	Honorable Deborah Batts	
12) <i>In Re: Vivendi Universal</i> Oct 2009	Honorable Richard Holwell	
13) <i>Infosint v Lundbeck</i> 2009	Honorable Lewis Kaplan	Oct
14) <i>City of NY v Exxon Mobil</i> 2009	Honorable Shira Scheindlin	July

If Your Honor is agreeable to these arrangements, the parties would most appreciate if you would sign the enclosed order permitting us to proceed. Please let me know if you have any questions. Thank you for your consideration.

Respectfully submitted,

WESTON, GARROU & MOONEY

By

/s/

JEROME H. MOONEY, III

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cc: Jason P. Hernandez,
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